

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF WITHDRAWAL OF DEBTOR’S MOTION FOR ENTRY OF AN ORDER
HOLDING THAT THE BOWLES LITIGATION VIOLATES THE AUTOMATIC STAY**

USA Gymnastics, as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), hereby withdraws the *Debtor’s Motion For Entry Of An Order Holding That The Bowles Litigation Violates The Automatic Stay* [Dkt. 1417] (the “**Stay Motion**”).²

On February 3, 2021, counsel for Plaintiffs in the Bowles Litigation sent the Debtor’s counsel a file-stamped notice dismissing all claims against the Debtor. Plaintiffs’ counsel further agreed to file an amended complaint that removes all factual allegations against the Debtor. The Debtor appreciates the Court scheduling an expedited hearing on the Stay Motion, but, in light of the dismissal of the Debtor from the Bowles Litigation and the representations from Plaintiffs’ counsel, the Debtor withdraws the Stay Motion, without prejudice to the Debtor’s rights to challenge any future violations of the automatic stay.

¹ The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

² Capitalized terms used herein but not defined shall have the meaning given to them in the Stay Motion.

Dated: February 3, 2021

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Catherine Steege

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